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November 22, 2024

**Via ECF and E-mail**

Honorable Claire Cecchi, U.S.D.C.J.  
U.S. District Court-District of New Jersey  
50 Walnut Street-MLK Building, Courtroom 5B  
Newark, NJ 07101

Re: U.S.A. v. Scanlon No. 24-cr-0682 (CCC)

Dear Judge Cecchi:

We represent Defendant Christopher Scanlon who was charged in a one count indictment on Oct 11, 2024 (ECF 48). We write, respectfully, as a follow-up to our November 11, 2024, correspondence (ECF 52) seeking determination on the Government's Motion for Continuance and Complex Case designation filed on October 25, 2024 (ECF 49) which the defense opposed on October 28, 2024. (ECF 50) Thus, this pending motion has been fully briefed and ripe for determination.

As noted in our brief, the Government contends its investigation has been ongoing for the past 18 months, however in actuality it has been investigated, at length, for three and half (3.5) years. Over five hundred days ago, Mr. Scanlon was removed from a plane in Florida, subsequently placed on a GPS monitor resulting, at that time, from a one count complaint.

Since the subject of the Motion is a threshold Constitutional issue, and many weeks of the overall 70 Day Speedy Trial clock has run, we seek further guidance from the Court as to pending Motion.

The tortured history in this case has left Defendant fighting to review actual tangible evidence, assess claimed witnesses, and challenge the assumptions and allegations offered, repeatedly, by the government. This is one of many reasons why the pending motion concerning his right to Speedy Trial is so critical. The decision on the Motion will enable our client to assess next steps, including Appeal rights, corresponding trial date, Rule 16 and related evidentiary disclosures.

We appreciate the Court's workload, and certainly recognize that for every defendant his or her own respective case is the most critical. However, we would, again respectfully, seek to have your Honor consider the importance of our client's Speedy Trial Act Rights, especially given the amount of time that has passed since the inception of the investigation, burden it has placed on our client and lack of evidence previously disclosed.

Very truly yours,  
COLE SCHOTZ P.C.

/s/ Michael S. Weinstein

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